

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE INDIRECT
PURCHASER ANTITRUST LITIGATION

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: Civil Action No.: 23-3249 (WJM)(JSA)
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[PROPOSED] ORDER

THIS MATTER having been opened to the Court by counsel for the Indirect Purchaser Plaintiffs (“IPPs”), and the Court having reviewed IPPs’ submission dated August 11, 2023, and for good cause appearing,

IT IS THIS _____ day of August, 2023

ORDERED as follows:

1. The Court makes the following appointment according to Rule 23(g)(3):

IPP Interim Class Counsel

Blaine Finley, Michelle Looby

IPP Steering Committee

Jon Tostrud, Chris Le

IPP Liaison Counsel

Joseph J. DePalma

These appointments are personal to the individual attorney appointed. The Court may add or replace members upon request from Co-Lead Counsel or on its own motion, if and as circumstances warrant.

2. IPP Interim Class counsel, Steering Committee Member, and Liaison Counsel shall, in their discretion, be responsible for coordinating Plaintiffs' pretrial activities and shall:

- a. Determine and present (in briefs, oral argument, or such other fashion as may be appropriate, personally or by a designee) to the Court and Defendants the position of Plaintiffs on all matters arising during pretrial proceedings;
- b. Coordinate the initiation and conduct of discovery on behalf of Plaintiffs consistent with the requirements of Fed. R. Civ. P. 26, including the preparation of master interrogatories and master requests for production of documents and coordinate the examination of witnesses in depositions;
- c. Coordinate discovery efforts with co-counsel to ensure that discovery is conducted in an efficient, orderly, and non-duplicative manner;
- d. Conduct and coordinate settlement negotiations;
- e. Delegate specific tasks to other counsel or committees of counsel, as authorized by the Court, in a manner to ensure that pretrial preparation is conducted efficiently and effectively;
- f. Enter into stipulations with opposing counsel for the conduct of the litigation;
- g. Prepare and distribute periodic status reports to the parties;
- h. Maintain adequate time and disbursement records covering services for all Plaintiffs' counsel in these actions;
- i. Monitor the activities of co-counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;
- j. Perform such other duties as may be incidental to proper coordination of Plaintiffs' pretrial activities or authorized by further order of the Court;

- k. Appoint additional committees including, but not limited to, expert, discovery, trial, and settlement committees; and
- l. Allocate among Plaintiffs' counsel any award of attorney's fees and expenses.

WILLIAM J. MARTINI, U.S.D.J.